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January 16, 2025

**Via ECF**

Hon. Philip M. Halpern, U.S.D.J.  
 The Hon. Charles L. Brieant Jr. Federal Building and Courthouse  
 300 Quarropas St.  
 White Plains, NY 10601-4150

Re: *Wolf, et al. v. Dolgen New York, LLC*  
 Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”), and Defendant Dolgen New York, LLC (“Dollar General”, the parties collectively, the “Parties”), through their undersigned counsel, submit this joint letter with a status update regarding settlement in accordance with Your Honor’s order provided at the August 29, 2024 in-person hearing.

Since the last status report, (D.E. 86), the Parties continue making progress towards a potential resolution.

Respectfully submitted,

**THE DANN LAW FIRM, PC**

/s/ Javier L. Merino  
 Javier L. Merino, Esq.  
*Counsel for Plaintiffs and the Putative Class*

**McGUIREWOODS LLP**

/s/ Philip A. Goldstein  
 Philip A. Goldstein, Esq.  
*Counsel for Defendant Dolgen New York, LLC*